

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

TRUSTEES OF THE IBEW LOCAL 7
PENSION FUND, IBEW LOCAL 7
ANNUITY FUND, IBEW LOCAL 7
APPRENTICESHIP & TRAINING FUND,
IBEW LOCAL 7 LABOR MANAGEMENT
COOPERATION FUND, and IBEW LOCAL
7 SUPPLEMENTAL HEALTH AND
WELFARE FUND; TRUSTEES OF THE
NEW ENGLAND ELECTRICAL WORKERS
BENEFIT FUND; TRUSTEES OF THE
NATIONAL ELECTRICAL BENEFIT
FUND; and IBEW LOCAL 7.

Civil Action No. 3:20-cv-11672

Plaintiffs,

v.

COGHLIN ELECTRICAL CONTRACTORS,
INC.

Defendant.

JOINT STATEMENT

Pursuant to Local Rule 16.1 and this Court's Scheduling Order, the Parties respectfully submit this Joint Statement.

This case regards employee benefit contributions owed to ERISA benefit funds and IBEW Local 7 (collectively "the Plaintiffs"), for work performed pursuant to collective bargaining agreements between Coghlin Electrical Contractors, Inc. ("Coghlin") and IBEW Local 7. The Plaintiffs have recovered amounts from third parties that have reduced the amounts owed by Coghlin. Accordingly, the Parties are currently in settlement discussions regarding the remaining amounts allegedly owed by Coghlin.

PROPOSED PRE-TRIAL SCHEDULE

The Parties have agreed to the following proposed schedule, in the event that resolution is not achieved through settlement:

May 15, 2021	Initial Requests for Production and Interrogatories Submitted
July 15, 2021	Any depositions noticed
September 15, 2021	End of Discovery
November 15, 2021	Deadline for the filing of Summary Judgment Motions

Respectfully submitted,

**COGHLIN ELECTRICAL
CONTRACTORS, INC.**

By its attorney,

/s/ Elise M. Kuehn
John J. McNamara
BBO No. 557882
Elise M. Kuehn
BBO No. 688829 LANE
McNAMARA LLP 257 Turnpike
Road, Suite 240 Southborough,
MA 01772
(508) 905-1010
jmcnamara@lanemcnamara.com
ekuehn@lanemcnamara.com

Dated: March 24, 2021

PLAINTIFFS

By their attorney,

/s/ Colby J. Jackson
Thomas R. Landry (BBO #625004)
Colby J. Jackson (BBO #696825)
KRAKOW, SOURIS, and LANDRY LLC
225 Friend Street, Suite 503
Boston, MA 02114
tlandry@krakowsouris.com
cjackson@krakowsouris.com
P: 617-723-8440
F: 617-723-8443

Dated: March 24, 2021

LOCAL RULE 16.4 CERTIFICATION

I certify that I have conferred with counsel regarding establishing a budget for the costs of conducting this litigation and various alternative courses, and to consider the resolution of the litigation through the use of alternative dispute resolution programs.

/s/ Daniel D'Alma
Business Manager, IBEW Local 7

March 24, 2021
Date

I certify that I have conferred with my client regarding establishing a budget for the costs of conducting this litigation and various alternative courses, and to consider the resolution of the litigation through the use of alternative dispute resolution programs.

/s/ Colby J. Jackson
Counsel for Plaintiffs

March 24, 2021
Date

CERTIFICATE OF SERVICE

I hereby certify that the foregoing has been filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent by first class mail, postage prepaid, to those indicated as non-registered NEF participants on this 24th day of March, 2021.